

HAND DELIVERED



## Water Resources Associates, Inc.

Hydrologists • Hydrogeologists • Engineers • Forensic Hydrologists

December 29, 1989

Mr. Lowell M. Carty  
Project Manager  
Arizona Department of  
Environmental Quality  
2005 North Central Avenue  
Phoenix, Arizona 85004

**SUBJECT: SUMP AND DRYWELL SYSTEMS AT CAPITOL ENGINEERING COMPANY**

Dear Lowell:

As you are aware, for approximately the last year, Capitol Engineering Company ("Capitol") has conducted an environmental investigation of the facility located on South 7th Street and East Southern Pacific Drive in Phoenix, Arizona (the "Property"). This investigation has been conducted in order to evaluate the relationship of historical and present activities on the Property in relation to existing ground-water conditions. As a result of these investigatory efforts, Capitol has obtained a considerable amount of data which, in Capitol's view, confirm that Capitol has not contributed to groundwater degradation in the area. In addition, Capitol's findings also indicate that previous occupants of the Property have not degraded groundwater. It is my understanding from you that, notwithstanding Capitol's view, the Department has not elected to place Capitol in the East Washington Area "inactive" category at this time.

In your letter to Mr. David Porter, of Capitol, dated August 30, 1989, the Department made certain recommendations in the event Capitol elected to undertake further investigatory efforts at the Property. Your letter to me dated December 11, 1989 offered additional comments in this regard. Because, however, in Capitol's view, the lengthy investigatory effort already undertaken at the Property indicates that no release at the Property has impacted groundwater, Capitol does not elect to undertake any further investigatory efforts at the Property with regard to the above issue at this time.

It might be helpful for me to summarize the results of the investigation already conducted by Capitol.

Extensive interaction including provision of a work plan, a final report, and numerous letters has occurred between Capitol, their consultant Water Resources Associates, Inc. (WRA), and the Department.

- 1) April 3, 1989      Final work plan from WRA to ADEQ  
Re: Final Work Plan for the Environmental Assessment and Site Investigation of the Capitol Engineering Properties.
- 2) June 9, 1989      Final Report from WRA to ADEQ  
Re: Final Report on the Site Investigation of the Capitol Engineering Properties.
- 3) August 30, 1989      Letter from ADEQ to Capitol  
Re: Decision not to place the Capitol Engineering Facility in the Inactive Category.
- 4) Sept. 18, 1989      Letter from WRA to ADEQ  
Re: Response to ADEQ regarding: 1) Phase I Remedial Investigation for Evaluation of PCBs and Pesticides, and 2) Inactive Category Status for the Capitol Engineering Facility.
- 5) Sept. 25, 1989      Letter from Lancy, Scult, and Lazarus to ADEQ  
Re: Scheduling and Intent of PCB and Chlorinated Solvent Studies
- 6) Sept. 30, 1989      Letter from ADEQ to WRA  
Re: Response to WRA Letter of September 18, 1989
- 7) Oct. 26, 1989      Proposal from WRA to ADEQ  
Re: Proposal in Response to ADEQ's Sept. 30, 1989 Letter Regarding Sump and Dry Well Systems at Capitol Engineering.
- 8) Dec. 11, 1989      Letter from ADEQ to WRA  
Re: Proposal in Response to ADEQ's Sept. 30, 1989 Letter Regarding Sump and Dry Well Systems at Capitol Engineering.

We hereby request that ADEQ make this letter and all the documents identified above part of the Agency's Administrative Record for Capitol.

Numerous findings were presented in the above documents, particularly as a result of the historical records review, personal interviews, and on-site sampling. A number of the key findings are summarized and restated below.



- 1) In general, no contamination or environmental degradation of the Property were evident during the visual site inspections.
- 2) Capitol Engineering's historical and present use of chemicals is restricted to spray cans, paint cans, and one 55-gallon drum of paint thinner. Used thinner is contained in another 55-gallon drum. Capitol is registered as a small quantity waste generator.
- 3) Ownership records for the three Capitol parcels were included in the Final Work Plan (aforementioned Document Number 1). As indicated, Capitol has occupied the 724 East Southern Pacific Drive parcel since the late 1940's. Interviews were conducted with former representatives of the companies that had previously occupied the properties at 415 and 419 South 7th Street. According to interviewees, the only potential for contamination on the three parcels existed at the 415 South 7th Street location where some residual waste from an etching process was allowed by Phoenix Manufacturing to wash down into a drain located in the floor of the building and through a collection system into the City sewers. This area of the subject site (the Drain and Sumps) was sampled by WRA. Additionally, the dry wells on the 419 South 7th Street property which reportedly received only stormwater runoff were also sampled by WRA.
- 4) The Drain and Sump System and Drywells were sampled by WRA for chlorinated solvents by EPA Method 8010. No solvents were detected in the drywell sludges. Concentrations of 1,1,1-TCA and 1,1-DCA were observed in the Drain and Sump System. However, observed concentrations of TCA in the system sludge were one to two orders of magnitude lower than the State Action Level of 20 mg/kg. There is no State Action Level for 1,1-DCA. The highest observed concentrations of 1,1-DCA in sludge were 0.53 mg/kg.

The contents of the sumps and drain were excavated and handled as a hazardous waste. No structural problems, cracks or pathways into the subsurface were observed in the sumps or at the 10-inch drain leading to the sumps. According to our observations, overflow from the westernmost of the three sumps would flow directly into the City of Phoenix sewer system.

- 5) Based on information provided by Kleinfelder in the Draft Phase I Report (October 1988) and Final Phase I Report (August 1989), and based on water quality information obtained by WRA, there is no indication of ground-water quality impacts from the property. Down-



gradient wells generally show lower levels of contamination compared to upgradient wells. The compounds TCA and 1,1-DCA are relatively insignificant constituents in the existing ground-water quality degradation of the area.

Water Resources Associates, Inc. statement in the Final Report after the above findings were compiled is that "no further work is recommended regarding investigation or clean-up of organic solvents at the Capitol facilities. Capitol Engineering should maintain vigorous waste management procedures for the low volumes of solvents which they routinely use in the course of business operations."

Although no further work was recommended by WRA regarding the study of organic solvents on the Property, further evaluation of evidenced PCB contamination in the "Rail Spur" area was recommended. This work is ongoing as the Final Plan for the Phase I Remediation has been submitted to you (dated December 27, 1989).

We thank you for your continuing interaction as we look forward to completing the evaluation of PCB residues in the "Rail Spur" area.

Respectfully Submitted,

WATER RESOURCES ASSOCIATES, INC.



Edward D. Ricci  
Vice President  
Director of Environmental Services

cc: David Porter - Capitol Engineering  
Kenneth Hodson - Lancy, Scult and Lazarus  
Dale Head - Head and McCoy  
Stephen D. Noel - President, WRA  
WRA File: 3400

